

September 5, 2006

Dr. Karen McDowell
San Francisco Estuary Project
1515 Clay Street
Oakland, CA 94612-1413

Dear Dr. McDowell:

Subject: Draft CA Aquatic Invasive Species Management Plan (August 2006)

Staff of the Delta Protection Commission has reviewed the draft California Aquatic Invasive Species Management Plan, and offers the following general comments:

The Delta Protection Act (Act) was enacted in 1992 in recognition of the increasing threats to the resources of the Primary Zone of the Delta from urban and suburban encroachment having the potential to impact agriculture, wildlife habitat, and recreation uses. Pursuant to the Act, a Land Use and Resource Management Plan for the Primary Zone (Management Plan) was completed and adopted by the Commission in 1995.

The Management Plan sets out findings, policies, and recommendations resulting from background studies in the areas of environment, utilities and infrastructure, land use, agriculture, water, recreation and access, levees, and marine patrol/boater education/safety programs. As mandated by the Act, the policies of the Management Plan are incorporated in the General Plans of local entities having jurisdiction within the Primary Zone. Both the Act and the Management Plan are available for your reference at the Commission's website, www.delta.ca.gov.

The findings, policies and recommendations from the Management Plan that are relevant to this project include, but are not limited to, the following:

Environment

- Finding 8: The native population of fish and other aquatic species has been modified by hydromodification including water diversion, etc., through introduction of exotic species and other causes. Numbers of both native and of some introduced fish have dropped dramatically since the late 1960's; numbers have dropped so low that winter-run Chinook salmon and Delta smelt have been listed as endangered and threatened, respectively. However, the population of some introduced species of fish and other introduced aquatic species throughout the aquatic food chain has substantially increased.
- Recommendation 3: Undeveloped channel islands provide unique opportunities for permanent wildlife habitat in the Primary Zone. A strategy should be developed to encourage permanent protection and management of the channel islands. Protection may include: acquisition, conservation easements, or memoranda of understanding. Management may include: protection from erosion, controlling human access, or habitat

management, such as planting native plants and removing exotic plants. Some larger, reclaimed channel islands may be suitable for mixed uses, such as recreation and habitat. Any development on channel islands must ensure long-term protection of the wildlife habitat.

- Recommendation 4: Feasible steps to protect and enhance aquatic habitat should be implemented as may be determined by resource agencies consistent with balancing other beneficial uses of Delta resources.

Water:

- Policy 2: Local governments shall ensure that design, construction, and management of any flooding program to provide seasonal wildlife habitat on agricultural lands shall incorporate "best management practices" to minimize mosquito breeding opportunities and shall be coordinated with the local vector control districts. (Each of the four vector control districts in the Delta provides specific wetland/mosquito management criteria to landowners within their district.)

Marine Patrol, Boater Education, and Safety Programs:

- Policy 6: Local governments that have or plan to have marine patrol, boater education, and/or safety programs shall develop funding and implementation strategies to remove abandoned vessels from county waterways to avoid pollution of Delta waters and remove hazards to navigation.

You are also requested to take into consideration the comments from numerous University of California researchers at the public meeting on August 28, 2006, asking that their past and ongoing efforts related to non-native and invasive species be incorporated into the program framework, and that actions under this framework not duplicate or re-create their existing data sets and information. It is also assumed that all input provided by Commission staff at the meeting will be taken into consideration.

Thank you for the opportunity to review the document. Commission staff plans to continue to be involved in this program. Please contact me at (916) 776-2292 or lindadpc@citlink.net if you have any questions about the Commission or the comments provided herein.

Sincerely,

Linda Fiack
Executive Director